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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket No.05-9
Table of Allotments,) RM-11141
FM Broadcast Stations)
(Walla Walla, Washington, and)
Athena, Ione, Hermiston, La Grande)
and Arlington, Oregon)

To: Chief, Policy and Rules Division

SUPPLEMENTAL COMMENTS

Two Hearts Communications, LLC ("Two Hearts"), licensee of Station KHSS which operates on Channel 264C3 at Walla Walla, Washington, filed a timely counterproposal in this proceeding wherein it proposed, *inter alia*, that Channel 264C2 be substituted for Channel 264C3 at Walla Walla, Washington and then be reallocated from Walla Walla to Athena, Oregon, as that community's first local aural service.

On March 21, 2005, SSR Communications, Inc. ("SSR") filed a counterproposal in MM Docket No. 05-10 proposing various allotment changes at communities in Oregon and Idaho. Among the allotment changes proposed by SSR is the allotment of Channel 265C at Prairie City, Oregon. This allotment proposal conflicts with Two Heart's Counterproposal in this proceeding to allot Channel 264C2 at Athena, Oregon.

Two Hearts is filing these Supplemental Comments, and is simultaneously filing Reply Comments in Docket 05-10 (i) to point out that Two Heart's proposed first local service at Athena (an incorporated city with a 2000 Census population of 1,221) is preferred over SSR's proposed first local service at Prairie City (an incorporated city with a 2000 Census population of 1,080) and (ii) to show that it is possible to accommodate both the Athena and Prairie City allotment proposals by allotting Channel 260C at Prairie City in place of SSR's proposed Channel 265C.

As shown in the attached Engineering Statement prepared by the firm of Hatfield & Dawson, if the Commission adopts Two Heart's allotment proposals, which include substituting Channel 225C1 for Channel 260C1 at La Grande, Oregon, Channel 260C can be assigned for use at Prairie City in full compliance with the Commission's channel separation requirements, thereby eliminating the conflict between Two Heart's Counterproposal in this proceeding and SSR's Counterproposal in Docket 05-10.

Respectfully submitted,

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Date: April 1, 2005

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**Engineering Statement
Reply Comments
MB Dockets No. 05-9 & 05-10
March 2005**

This Engineering Statement has been prepared on behalf of Two Hearts Communications, LLC ("Two Hearts"), licensee of station KHSS Channel 264C3 Walla Walla. Two Hearts has filed a counterproposal in MB Docket No. 05-9, requesting that the Commission:

- 1) Substitute Channel 264C2 for Channel 264C3 at Walla Walla, Washington, reallocate Channel 264C2 to Athena, Oregon, and modify the license of station KHSS to specify operation on Channel 264C2 at Athena;
- 2) Substitute Channel 261A for Channel 263A at Hermiston, Oregon, and modify the license of station KQFM to specify operation on Channel 261A at Hermiston;
- 3) Substitute Channel 225C1 for Channel 260C1 at La Grande, Oregon, and modify the license of station KWRL to specify operation on Channel 225C1 at La Grande, and;
- 4) Substitute Channel 295C2 for vacant-and-unapplied-for Channel 261C2 at Arlington, Oregon.

This reallocation plan was timely filed as a counterproposal in MB Docket No. 05-9. The NPRM in that proceeding proposed the allotment of Channel 295A at Lone, Oregon.

On March 21, 2005, SSR Communications, Inc. ("SSR") filed a counterproposal in MB Docket No 05-10, proposing a number of allotment changes at communities in Oregon and Idaho. Among the SSR proposals is the allotment of vacant Channel 265C at Prairie City, Oregon. The allotment

of Channel 265C at Prairie City conflicts with the request by Two Hearts to allot Channel 264C2 at Athena, Oregon, at preferred allotment site coordinates.

The SSR counterproposal was coincidentally timely-filed as a counterproposal in MB Docket No. 05-9, since both Dockets 05-9 and 05-10 had the same comment and counterproposal deadline. Consequently, the Two Hearts and SSR filings are mutually-exclusive, thereby drawing together the two proceedings.

Two Hearts' proposed first local service at Athena (an incorporated city with a 2000 Census population of 1,221) is preferred over SSR's proposed first local service at Prairie City (an incorporated city with a 2000 Census population of 1,080). Nevertheless, it is possible to make allotments at both communities by use of an alternate channel at Prairie City.

Channel 260C at Prairie City

As outlined in the attached channel study, Channel 260C can be assigned for use at Prairie City in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 225C1 is substituted for Channel 260C1 at La Grande, Oregon, as requested in the Two Hearts counterproposal in MB Docket No. 05-09.

For this spacing study the allotment coordinates requested by SSR (N44-17-47 x W118-44-22) have been used. As demonstrated by SSR, this site will provide greater than 70 dBu coverage for all of Prairie City.

Alternatively, Channel 260C can be assigned for use at Prairie City with a site restriction just 2 km south of the community. This would be consistent with Commission precedent which prefers the allotment of the channel with the least site restriction possible.

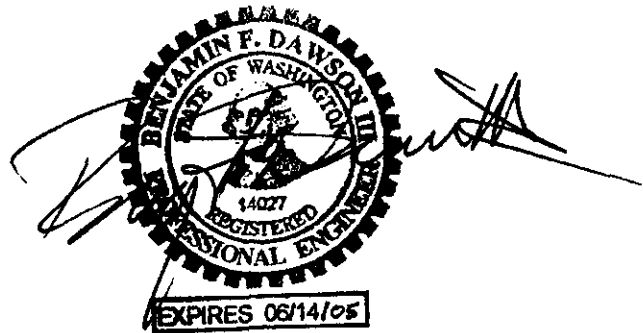
Conclusion

The use of an alternate channel at Prairie City will allow Athena to receive its first local service, while also allowing the Commission to make a new allotment at Prairie City.

Statement of Engineer

This Engineering Statement, supporting Reply Comments in MB Dockets 05-9 and 05-10, has been prepared by Erik C. Swanson under my direct supervision. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 29th day of March, 2005.



Benjamin F. Dawson III, P.E.

Erik C. Swanson

Hatfield & Dawson Consulting Engineers

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FM Database Date: 050324

SEARCH PARAMETERS
 Channel: 260C 99.9 MHz
 Latitude: 44 17 47
 Longitude: 118 44 22
 Safety Zone: 50 km
 Job Title: PRAIRIE CITY 260C

Page 1

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KFSL-LP CP	FOSSIL OR	BNPL-010613ABY	258L1 99.5	0.100 -84.9	45-00-30 120-12-35	304.8	140.93 0.00	0 LPFM
KMTK LIC	BEND OR	BLH-041027ADJ	259C2 99.7	26.000 208.0	44-04-39 121-19-57	264.2 SS	208.75 20.75	188 CLEAR
NEW-T APP	HERMISTON OR	BNPFT-030317IJC	259D 99.7	0.170 129.0	45-45-46 119-10-57	348.1	166.66 0.00	0 TRANS
K206CT CP MOD	BOISE ID	BMPFT-040917ABW	260D 99.9	0.250 1044.0	43-45-18 116-05-52	105.0	220.17 0.00	0 TRANS
K260AO CP	MCCALL ID	BNPFT-030718AIF	260D 99.9	0.010 885.0	45-00-00 116-08-04	68.3	220.95 0.00	0 TRANS
NEW-T APP	HERMISTON OR	BNPFT-030317IIV	260D 99.9	0.170 128.0	45-51-58 119-18-38	345.8	180.15 0.00	0 TRANS
KWRL LIC	LA GRANDE OR	BLH-970805KE	260C1 99.9	60.000 155.0	45-12-59 118-00-00	29.5	117.82 -152.18	270 SHORT
NOTE: TO CHANNEL 225C1 PER TWO HEARTS COUNTERPROPOSAL IN MB DOCKET 05-9								
NEW-T APP	PENDLETON OR	BNPFT-030317IUD	260D 99.9	0.250 112.0	45-41-42 118-50-24	357.1	155.63 0.00	0 TRANS
NEW-T APP	PENDLETON OR	BNPFT-030314BYY	260D 99.9	0.250 111.0	45-42-13 118-40-53	1.7	156.45 0.00	0 TRANS
K260AN CP	CLARKSTON WA	BNPFT-030820AAN	260D 99.9	0.041 269.0	46-18-59 117-02-24	30.0	261.08 0.00	0 TRANS
NEW-T APP	RICHLAND WA	BNPFT-030317KJO	260D 99.9	0.250 77.0	46-20-40 119-20-43	348.5	232.52 0.00	0 TRANS
ADD	ARLINGTON OR	RM-10458	261C2 100.1	0.000 0.0	45-43-14 120-11-59	324.6	195.71 7.71	188 CLOSE
ADD	ARLINGTON OR	RM-10667	261C2 100.1	0.000 0.0	45-43-04 120-11-53	324.6	195.39 7.39	188 CLOSE
ADD	ARLINGTON OR	RM-10663	261C2 100.1	0.000 0.0	45-43-01 120-11-59	324.5	195.39 7.39	188 CLOSE

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SEARCH PARAMETERS FM Database Date: 050324

Channel: 260C 99.9 MHz Page 2
 Latitude: 44 17 47
 Longitude: 118 44 22
 Safety Zone: 50 km
 Job Title: PRAIRIE CITY 260C

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K261BH LIC	HEPPNER OR	BLFT-850226TC	261D 100.1	0.048 345.0	45-23-28 119-30-15	333.9	135.85 0.00	0 TRANS
ADD	HERMISTON OR	RM-bg-19	261A 100.1	0.000 0.0	45-52-45 119-25-52	343.1	184.13 19.13	165 CLEAR
K261BS LIC	MILTON-FREEWATER OR	BLFT-851224TC	261D 100.1	0.044 DA 170.0	45-55-24 118-22-18	8.9	183.11 0.00	0 TRANS
K261CG LIC	PASCO WA	BLFT-930913TC	261D 100.1	0.011 DA 518.0	46-06-23 119-07-50	351.5	203.49 0.00	0 TRANS

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

KQFM-H	HERMISTON		261A	0.000	45-51-57	345.8	180.12	165
VACANT	OR -		100.1	0.0	119-18-38		15.12	CLEAR

NOTE: AS PROPOSED IN TWO HEARTS COUNTERPROPOSAL IN MB DOCKET 05-9

===== END OF FM SPACING STUDY FOR CHANNEL 260 =====

CERTIFICATE OF SERVICE

I, David Tillotson, do hereby certify that a copy of the foregoing Supplemental Comments has been sent via first class United States mail, postage pre-paid, this 1st day of April 2005, to:

John J. McVeigh, Esq.
c/o Klickitat Broadcasting
1210 Blue Paper Trail
Columbia, MD 21044-2787

David Tillotson